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10 | *Counsel for Plaintiff*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**DECLARATION OF RACHEL B.
ABRAMS IN SUPPORT OF OPPOSITION
TO DEFENDANTS' MOTION TO
DISMISS DUPLICATE CASES**

20 This Document Relates to:

21 *A.P. v. Uber Technologies, Inc. et al.*, No. 3:25-
22 *cv-02105-CRB*

23 *Arpitkumar Patel v. Uber Technologies, Inc., et al; No. 3:25-cv-05287-CRB*

25 | *Jane Doe L.S. 618 v. Uber Technologies, Inc. et al., No.3:25-cv-06160-CRB*

1 I, Rachel B. Abrams, declare:

- 2 1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway and Wise, LLP. I am
3 admitted to practice before this Court. I make this declaration based on my own personal
4 knowledge. If called upon to testify, I could and would testify competently to the truth
5 of the matters stated herein:
- 6 2. On February 28, 2025, Peiffer Wolf Carr Kane Conway & Wise filed a complaint on
7 behalf of Plaintiff A.P. alleging sexual assault or harassment by an Uber driver in New
8 Jersey on June 27, 2023. *Complaint, A.P. v. Uber Technologies, Inc. et al., No. 3:25-cv-02105-CRB, ECF No. 1* (N.D. Cal. Feb. 28, 2025).
- 9 3. On June 27, 2025, Plaintiff A.P. filed a second complaint relating to the June 2023
10 incident this time through the Ben Martin Law Group and abandoning the pseudonym.
11 *Patel v. Uber Technologies, Inc. et al., No. 3:25-cv-05287-CRB, ECF No. 1* (N.D. Cal.
12 June 27, 2025).
- 13 4. On August 31, 2025, counsel for Defendants notified Peiffer Wolf and Ben Martin Law
14 Group that they believed that both firms filed claims on behalf of Plaintiff A.P.
15 5. After discussions and confirming dual representation of Plaintiff A.P., on October 16,
16 2025, Peiffer Wolf and Ben Martin Law Group resolved the dual representation issue,
17 agreeing that Peiffer Wolf's case will remain, and Ben Martin Law Group will dismiss
18 their case.
19 6. On July 22, 2025, Plaintiff Jane Doe LS 618, through counsel at Levin Simes, LLP, filed
20 a complaint alleging that an Uber driver sexually assaulted or harassed her in Dallas,
21 Texas, on July 29, 2023. *Complaint, Jane Doe L.S. 618 v. Uber Technologies, Inc. et al., No. 3:25-cv-06160-CRB, ECF No. 1* (N.D. Cal. July 22, 2025).
- 22 7. One day later, on July 23, 2025, Plaintiff filed a second complaint relating to the July
23 2023 incident under a different pseudonym through counsel at Peiffer Wolf Carr Kane
24 Conway & Wise. *Complaint, K.L. v. Uber Technologies, Inc. et al., No. 3:25-cv-06178-CRB, ECF No. 1* (N.D. Cal. July 23, 2025).
- 25 8. On August 21, 2025, counsel for Defendants notified Peiffer Wolf and Levin Simes that

1 both firms filed claims on behalf of Plaintiff K.L.

2 9. Peiffer Wolf reached out to Levin Simes numerous times in an effort to resolve this dual
3 representation issue.

4 10. After a discussion and confirming dual representation of Plaintiff K.L., on October 28,
5 2025, the firms resolved the dual representation issue, agreeing that Levin Simes will
6 continue with their case, and Peiffer Wolf will dismiss their case on behalf of Plaintiff
7 K.L.

8 Executed this 28th day of October, 2025 in San Francisco, California.

9 /s/ Rachel B. Abrams
10 Rachel B. Abrams

11 *Counsel for Plaintiff*

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